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March 18, 2025

Via ECF Filing

The Hon. Judge Lara K. Eshkenazi, U.S.M.J.
U.S. District Court, Eastern District of New
York 225 Cadman Plaza East
Brooklyn, New York 11201

Re: Cheikh Amme v. Alsayedi et al, : 1:24-cv-04684-LKE

Dear Honorable Magistrate Judge Eshkenazi:

I represent all Defendants in this matter. This letter is submitted *on consent* of counsel for Plaintiffs. I am writing Your Honor to explain the basis of *Defendants'* request for one additional extension of the fact discovery completion deadline of March 19, 2025 to, through and including, April 18, 2025. On March 2, 2025, my 90-year-old mother had fallen in her apartment and has undergone hospitalization in Gaithersburg Maryland. I have over the last three weeks, been largely out of the office, staying near her treatment in Maryland.

Additionally, approximately two weeks ago, I attempted to contact my client Mr. Alsayedi to prepare discovery responses and confirm his deposition date scheduled for this Thursday March 20, 2024. After multiple attempts to communicate with him, he finally responded yesterday, explaining that he is in Saudi Arabia observing Ramadan, returning April 3, 2025. Based upon my own personal issues and my client being out of the country observing Ramadan in Saudi Arabia, please respectfully accept this request for one additional extension of the fact discovery deadline to April 18, 2025.

The parties are continuing to discuss the possibility of a settlement.

If your Honor grants this request, please also extend the dispositive motion commencement deadline of April 19, 2025, to May May 19, 2025.

Your Honor, thank you for your consideration of this request.

Respectfully submitted,


By: Roger Greenberg (RG 9273)

CC: Plaintiffs' Counsel Via ECF'